

Kenneth Rust
Director
Federal Regulatory Matters

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NYNEX

EX PARTE OR LATE FILED

October 24, 1995

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

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OCT 24 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Data Request in CC Docket No. 95-72

Dear Mr. Caton:

In a letter to me dated September 29, 1995, Kathleen Wallman, Chief, Common Carrier Bureau requested that the NYNEX Telephone Companies (NYNEX) provide data regarding the relative non-traffic sensitive (NTS) costs of single channel and multi-channel services to allow members of her staff to determine the proper number of Subscriber Line Charges (SLCs) to apply to derived channel services like ISDN. Attached are the requested data, edited to exclude proprietary information. A full set of data are being sent to Ms. Wallman, along with a request for confidential treatment. NYNEX continues to believe, however, that the only costs that are relevant when seeking to establish the proper level of assigned Interstate costs to be recovered via SLCs are those loop costs booked to accounts in the Common Line basket.

We will be contacting the appropriate members of the Common Carrier Bureau to clarify our concerns more fully, but in the meantime any questions regarding the data should be directed to me at the address or telephone number shown above.

Sincerely,



Attachment

cc: K. Wallman

L. Gelb



J. Myles

NYNEX Recycles

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NYNEX Response
FCC Data Request in CC Docket No. 95-72

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FEDERAL COMMUNICATIONS COMMISSION
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1) For each switched loop service you offer, please identify the NTS cost components, including any NTS cost components located in the central office. For each component, please provide a short name, a brief description, the USOA account number, and the separations category.

See Attachment 1, p. 1

(The costs for purposes of this request represent 1993 embedded direct costs for the state of New York.)

For each service, please provide the number of voice grade-equivalent channels per unit of service, indicate whether the customer provides a digital or analog signal, and note any waivers or interpretations of the FCC's rules governing the placement of termination equipment on the customer's premises.

	<u>No. of VG Equivalents</u>	<u>Type of Signal</u>	<u>Waivers</u>
1MR	1	Analog	None
1FR	1	Analog	None
1MB	1	Analog	None
PBX/Trunk	1	Analog/Digital	None
Centrex III	1	Analog/Digital	None
Intellipath	1	Analog/Digital	None
Flexpath	up to 24	Digital	None
Primary Rate ISDN	up to 24	Digital	None
Basic Rate ISDN	1 or 2	Digital	None

2) For each NTS cost component of each service, please provide the total annual cost booked, allocated to interstate, and apportioned to each access element for 1994. For capitalized costs, please provide the gross and net amounts and the annual depreciation expense.

See Attachment 1, p. 2-3

(The data provided represent 1993 data.)

3) For each service please provide the total monthly cost per unit of service apportioned to each access element.

See Attachment 1, p. 1

4) Explain any differences in NTS costs among different services.

Differences in NTS costs among the services reflect differences in both the actual office equipment and the outside plant facilities required for each of the services. Outside plant, or link, costs for different services reflect the special conditioning required for the four-wire connections necessary for services such as Flexpath and Primary Rate ISDN. Central office cost differences reflect the unique central office line termination equipment for each service. Different services require different types of line equipment cards, or terminations.

* * * * *

COST COMPONENT SUMMARY

<u>Single Channel</u>	<u>Total Monthly Cost</u>	<u>Cost Components</u>	<u>Primary Access Rate Element Basket</u>
[1MR, 1FR, 1MB, PBX/Trunk, Centrex III, Intellipath]	\$4.96-\$12.92 \$16.08-\$34.54	Port Link	Traffic Sensitive Common Line
<u>Multi-Channel</u>			
Flexpath	\$354.37 \$235.11	Port Link	Traffic Sensitive Common Line
ISDN-PRI	\$545.95 \$235.11	Port Link	Traffic Sensitive Common Line
<u>Multi-Channel - Other</u>			
ISDN - Basic	\$16.64 \$18.24	Port Link	Traffic Sensitive Common Line

ATTACHMENT 1

INVESTMENTS AND MONTHLY COSTS

\$18.18
\$4.96
\$23.14

\$34.54
\$4.96
\$39.51

\$18.24
\$4.96
\$23.20

\$20.47
\$5.68
\$26.15

\$16.08
\$12.70
\$28.78

\$21.65
\$12.92
\$34.57

\$235.11
\$354.37
\$589.49

\$235.11
\$545.95
\$781.07

Note: It should be noted that Separations is not designed to provide separated cost data on individual services within a category. Separated costs are only being supplied to comply with the FCC data request. It should also be noted that Depreciation is not done on an individual service basis.

NYNEX - NEW YORK

ATTACHMENT 1

SEPARATIONS-BASED COST/INVESTMENT SUMMARY

		Total Cost															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		IFR															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		MB															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		CENTREX III															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		INTELLIPATH															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		FLEXPATH - DP (DID)															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		ISDN - PRIMARY															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		ISDN - BASIC															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		DEMS															Land/Bld		Total Cost	
		17.00%															Land/Bld		Total Cost	
		25.00%															Land/Bld		Total Cost	
		90.00%															Land/Bld		Total Cost	
		BAF IS															Land/Bld		Total Cost	
		17.00%															Land/Bld		Total Cost	
		25.00%															Land/Bld		Total Cost	
		90.00%															Land/Bld		Total Cost	
		WIDEBAND IS															Land/Bld		Total Cost	
		17.00%															Land/Bld		Total Cost	
		25.00%															Land/Bld		Total Cost	
		90.00%															Land/Bld		Total Cost	
		MR															Land/Bld		Total Cost	
		Total Cost															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		IFR															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		PBX/TRUNK															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		CENTREX III															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		INTELLIPATH															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		FLEXPATH - DP (DID)															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		ISDN - PRIMARY															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	
		ISDN - BASIC															Land/Bld		Total Cost	
		Total															Land/Bld		Total Cost	
		(BASIS for IS allocation)															Land/Bld		Total Cost	
		Allocated to Interstate															Land/Bld		Total Cost	
		Common Line															Land/Bld		Total Cost	
		Traffic Sensitive															Land/Bld		Total Cost	
		Trunking (Special Access)															Land/Bld		Total Cost	

NEW YORK

NYNEX - NEW YORK

INVESTMENTS AND DEPRECIATION SUMMARY

Page 3